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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LTL MANAGEMENT LLC,

Plaintiff,

-v-

DR. JACQUELINE MIRIAM MOLINE,

Defendant.

Civil Action No.
3:23-cv-02990

Motion Return Date:
July 3, 2023

DECLARATION OF PETER C. HARVEY

I, Peter C. Harvey, of full age, hereby declare under penalty of perjury:

1. I am a member of the law firm of Patterson Belknap Webb & Tyler LLP. My office is located at 1133 6th Avenue, New York, NY 10036. I am a member in good standing of the Bar of New Jersey. There are no disciplinary proceedings pending against me.

2. I submit this declaration (the "Declaration") in connection with the *Plaintiff's Motion for Limited Expedited Discovery*, filed contemporaneously herewith. I have personal knowledge of the matters set forth herein.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the Memorandum Opinion and Order, entered in *Bell v. Am. Int'l Indus.*, No. 1:17-cv-00111-WO-JEP, ECF No. 398 (M.D.N.C. Sept. 13, 2022).

4. Attached hereto as **Exhibit 2** is a true and correct copy of the article entitled *Mesothelioma Associated with the Use of Cosmetic Talc*, Journal of Occupational and Environmental Medicine 62(1):11-17 (2020).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED: New York, New York
June 7, 2023

/s/ Peter C. Harvey
Peter C. Harvey

Exhibit List

Exhibit 1 – Memorandum Opinion and Order in *Bell v. Am. Int’l Indus.*, No. 1:17-cv-00111-WO-JEP, ECF No. 398 (M.D.N.C. Sept. 13, 2022)

Exhibit 2 – *Mesothelioma Associated with the Use of Cosmetic Talc*, Journal of Occupational and Environmental Medicine 62(1):11-17 (2020)